

**UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA**

**Case No. 3:15-cr-90
Related Case No. 3:22-cv-181**

United States of America,

Plaintiff,

vs.

Michael Adefemi Adeyemo,

Defendant.

MOTION TO COMPEL

On March 5, 2025, the Court ordered Michael Adeyemo’s counsel to “draft a proposed limited subpoena duces tecum for the Court’s approval.”¹ The Court also ordered Adeyemo’s counsel to “confer with the United States on the draft and work in good faith to resolve any further issues.”² Since then, Counsel has attempted to do follow these instructions.

First, on April 3, 2025, Counsel drafted and sent a proposed subpoena for the government’s review and approval. The government replied on April 9th and stated its ostensible client in the matter, Ron Hettich, objected to providing his personal

¹ Doc. 265 at 2.

² *Id.*

financial information (as required by the March 5th order). In an effort to resolve the issue, the government suggested asking Hettich if he would drop his objection if the government could receive any financial documents first and redact anything not responsive to the Court's order. Counsel agreed to this middle-ground position on April 10th. The government responded on April 16th and stated the proposed compromise didn't change Hettich's mind and he still objected to providing his personal financial information.

Given this, and the clear language of the Court's order, Counsel believes Hettich's objection is impermissible and thus a motion to compel is necessary. At a minimum, the Court should set a hearing on this motion, require Hettich to defend his objection, and then make a ruling. And that's because the current posture of the case is that the government—via its client—is ignoring an order of the Court. Absent justification, such disregard for the law cannot stand.

Date: April 24, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the end of the signature.

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